

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> , ¹)	
)	Case No. 19-23649 (RDD)
Debtors.)	
)	Jointly Administered

**SECOND SUPPLEMENTAL DECLARATION OF ARIK PREIS IN SUPPORT OF THE
APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
PURDUE PHARMA L.P., ET AL. TO RETAIN AND EMPLOY AKIN GUMP STRAUSS
HAUER & FELD LLP AS COUNSEL, NUNC PRO TUNC TO SEPTEMBER 26, 2019**

Pursuant to 28 U.S.C. § 1746 and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), I, Arik Preis, hereby declare as follows:

1. I am an attorney admitted to practice in the State of New York and the United States District Court for the Southern District of New York. I am a partner at the firm of Akin Gump Strauss Hauer & Feld LLP (“Akin Gump”). Akin Gump maintains offices at, among other places, One Bryant Park, New York, New York 10036. There are no disciplinary proceedings pending against me.

2. I am familiar with the matters set forth herein and make this supplemental declaration (the “Second Supplemental Declaration”) in connection with the *Application of the Official Committee of Unsecured Creditors* (the “Official Committee”) of *Purdue Pharma L.P.*, et

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

al. to Retain and Employ Akin Gump Strauss Hauer & Feld LLP as Counsel, Nunc Pro Tunc to September 29, 2019 [ECF No. 421] (the “Application”)² filed on November 5, 2019, my initial declaration attached as Exhibit B to the Application (the “Initial Declaration”) and the *Supplemental Declaration of Arik Preis in Support of the Application of the Official Committee of Unsecured Creditors of Purdue Pharma L.P., et al. to Retain and Employ Akin Gump Strauss Hauer & Feld LLP as Counsel, Nunc Pro Tunc, to September 26, 2019* [ECF No. 1336].

3. As set forth in the Application, which was granted by this Court on November 21, 2019 [ECF No. 522], Akin Gump committed to file a supplemental declaration pursuant to Bankruptcy Rule 2014 to the extent it discovered new information that was relevant to the Application and merited disclosure. *See* Initial Declaration ¶ 20. Accordingly, in connection with Akin Gump’s representation of the Official Committee,³ I submit this Second Supplemental Declaration to provide the additional disclosures set forth herein.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

³ On September 26, 2019, pursuant to Bankruptcy Code section 1102, the U.S. Trustee appointed nine members to sit on the Official Committee. *See Appointment of Official Committee of Unsecured Creditors* [ECF No. 131]. As originally constituted, the Official Committee comprised the following members: (i) The Blue Cross and Blue Shield Association; (ii) CVS Caremark Part D Services L.L.C. and CaremarkPCS Health, L.L.C.; (iii) Ryan Hampton; (iv) Cheryl Juare; (v) LTS Lohmann Therapy Systems, Corp.; (vi) Pension Benefit Guaranty Corporation; (vii) Walter Lee Salmons; (viii) Kara Trainor; and (ix) West Boca Medical Center. *Id.* Following careful consideration and consistent with the Official Committee’s fiduciary obligations to all unsecured creditors, the Official Committee determined to add three *ex officio* members: (x) Cameron County, Texas, on behalf of approximately 1,222 entities, including 1,172 cities, counties and other governmental entities, seven Native American tribal nations, six hospitals, two districts, 34 medical groups, two funds, and one veterans’ class across 36 states, representing the interests of approximately 60,000,000 individuals; (y) the Cheyenne and Arapaho tribes, on behalf of certain Native American Tribes and Native American affiliated creditors; and (z) Thornton Township High School District 205 on behalf of certain public school districts. *See Second Amended Verified Statement of the Official Committee of Unsecured Creditors of Purdue Pharma L.P., et al. Pursuant to Bankruptcy Rule 2019 to Disclose Addition of Third Ex Officio Member* [ECF No. 1294].

Specific Disclosures

4. On August 7, 2020, Melanie Miller agreed to join Akin Gump as an associate in the Financial Restructuring Group in the New York office effective as of fall 2020.⁴ Currently, Ms. Miller is employed as a law clerk for the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New York, who is presiding over these chapter 11 cases.

5. Upon her arrival at Akin Gump, Ms. Miller will not be involved in Akin Gump's representation of the Official Committee. In addition, in order to avoid the appearance of impropriety and to avoid any improper disclosure of confidences of the Official Committee, Akin Gump will notify lawyers and staff that Ms. Miller may not be involved in Akin Gump's representation of the Official Committee or otherwise participate in discussions regarding the same and will establish an ethical wall between the attorneys and staff representing the Official Committee and Ms. Miller.

6. In light of the foregoing, I do not believe that Ms. Miller's connections to the Honorable Robert D. Drain or this Court preclude Akin Gump from meeting the disinterestedness standard under the Bankruptcy Code.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief on this 11th day of August 2020.

/s/ Arik Preis
Name: Arik Preis

⁴ The offer was extended to Ms. Miller during the late afternoon on July 23, 2020. The specific date upon which Ms. Miller will join the firm has not yet been determined.